

INTEGRATIVE THERAPEUTICS INC.



NF Formulas



PhytoPharmica



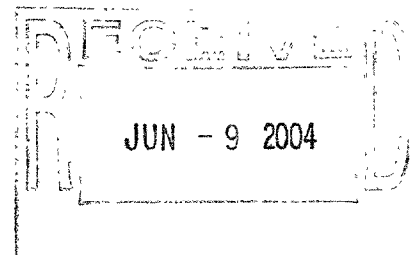
Tyler Encapsulations



Vitaline Formulas

June 1, 2004

Office of Nutritional Products, Labeling &
Dietary Supplements, HFS 810
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740



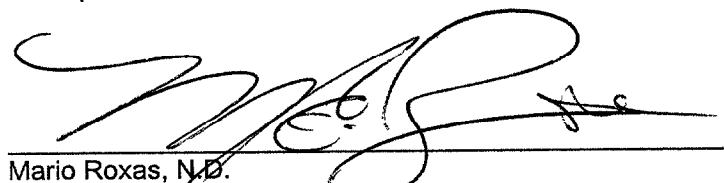
Notification of structure-function claims

Dear Sir:

This letter is to notify you that the following product manufactured, packed, and/or distributed by Integrative Therapeutics Inc. (9755 SW Commerce Circle, Suite B2, Wilsonville, OR 97070) has a label that contains a statement provided for by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Integrative Therapeutics Inc. wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and complies with section 403(r)(6) of the act. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

Product Name	Statement	Ingredient(s) to which claim refers	
Mega MultiVitamin Drink Mix	Includes Taurine and N-acetylcysteine, providing additional antioxidant support. †	Vitamin A (50% as beta carotene and as retinyl acetate) Vitamin C (as ascorbic acid) Vitamin D (as cholecalciferol) Vitamin E (as d-alpha tocopheryl acetate) Thiamin (as thiamine HCl) (Vitamin B1) Riboflavin (vitamin B2) Niacin (as niacinamide) Vitamin B6 (as pyridoxine HCl) Folic Acid Vitamin B12 (as cyanocobalamin) Biotin Pantothenic Acid (as calcium D-pantothenate) Calcium (as calcium lactate) Iodine (as potassium iodide) Magnesium (as magnesium glycinate) Zinc (as zinc sulfate) Selenium (as L-selenomethionine) Copper (as copper gluconate) Manganese (as manganese citrate) Chromium (as chromium picolinate) Molybdenum (as sodium molybdate) Sodium Potassium (from whey protein, guar gum, potassium citrate and potassium iodide)	Malic Acid Betaine Inositol Inulin (from chicory root) Hesperidin 50% (from citrus fruits) Taurine Glycine L-Tyrosine N-Acetylcysteine (NAC) L-Serine Stevia (Stevi rebaudiana) Leaf Extract Sour Cherry (Prunus cerasus) Fruit Extract Cranberry (Vaccinium macrocarpon) Fruit Extract Bilberry (Vaccinium myrtillus) Fruit Extract Boron (as sodium borate) Lutein (from Calendula officinalis) Zeaxanthin (from Calendula officinalis) Whey Protein Concentrate

I certify that the information contained in this notice is complete and accurate, and that Integrative Therapeutics Inc. has substantiation that the statement is truthful and not misleading.


Mario Roxas, N.D.
Director of Scientific and Technical Affairs

Date

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Product Name	Statement	Ingredient(s) to which claim refers	
Mega MultiVitamin Drink Mix	Mega MultiVitamin Drink Mix can be easily mixed with beverages or yogurt, providing an alternative means of delivering nutrients and flexible dosage options. †	Vitamin A (50% as beta carotene and as retinyl acetate) Vitamin C (as ascorbic acid) Vitamin D (as cholecalciferol) Vitamin E (as d-alpha tocopheryl acetate) Thiamin (as thiamine HCl) (Vitamin B1) Riboflavin (vitamin B2) Niacin (as niacinamide) Vitamin B6 (as pyridoxine HCl) Folic Acid Vitamin B12 (as cyanocobalamin) Biotin Pantothenic Acid (as calcium D-pantothenate) Calcium (as calcium lactate) Iodine (as potassium iodide) Magnesium (as magnesium glycinate) Zinc (as zinc sulfate) Selenium (as L-selenomethionine) Copper (as copper gluconate) Manganese (as manganese citrate) Chromium (as chromium picolinate) Molybdenum (as sodium molybdate) Sodium Potassium (from whey protein, guar gum, potassium citrate and potassium iodide)	Malic Acid Betaine Inositol Inulin (from chicory root) Hesperidin 50% (from citrus fruits) Taurine Glycine L-Tyrosine N-Acetylcysteine (NAC) L-Serine Stevia (Stevi rebaudiana) Leaf Extract Sour Cherry (Prunus cerasus) Fruit Extract Cranberry (Vaccinium macrocarpon) Fruit Extract Bilberry (Vaccinium myrtillus) Fruit Extract Boron (as sodium borate) Lutein (from Calendula officinalis) Zeaxanthin (from Calendula officinalis) Whey Protein Concentrate

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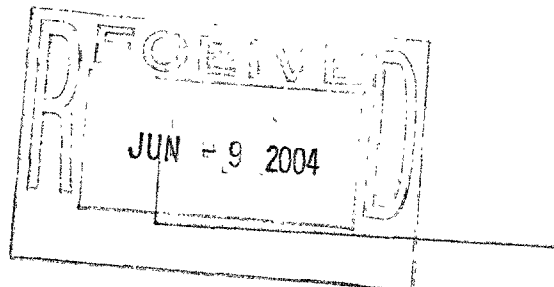
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Product Name	Statement	Ingredient(s) to which claim refers	
Mega MultiVitamin Drink Mix	Mega MultiVitamin Drink Mix also contains amino acids, fiber and antioxidant supplements to support optimal health and energy levels. †	Vitamin A (50% as beta carotene and as retinyl acetate) Vitamin C (as ascorbic acid) Vitamin D (as cholecalciferol) Vitamin E (as d-alpha tocopheryl acetate) Thiamin (as thiamine HCl) (Vitamin B1) Riboflavin (vitamin B2) Niacin (as niacinamide) Vitamin B6 (as pyridoxine HCl) Folic Acid Vitamin B12 (as cyanocobalamin) Biotin Pantothenic Acid (as calcium D-pantothenate) Calcium (as calcium lactate) Iodine (as potassium iodide) Magnesium (as magnesium glycinate) Zinc (as zinc sulfate) Selenium (as L-selenomethionine) Copper (as copper gluconate) Manganese (as manganese citrate) Chromium (as chromium picolinate) Molybdenum (as sodium molybdate) Sodium Potassium (from whey protein, guar gum, potassium citrate and potassium iodide)	Malic Acid Betaine Inositol Inulin (from chicory root) Hesperidin 50% (from citrus fruits) Taurine Glycine L-Tyrosine N-Acetylcysteine (NAC) L-Serine Stevia (Stevi rebaudiana) Leaf Extract Sour Cherry (Prunus cerasus) Fruit Extract Cranberry (Vaccinium macrocarpon) Fruit Extract Bilberry (Vaccinium myrtillus) Fruit Extract Boron (as sodium borate) Lutein (from Calendula officinalis) Zeaxanthin (from Calendula officinalis) Whey Protein Concentrate

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Mario Roxas, N.D.
Director of Scientific and Technical Affairs

Date

6/1/04

INTEGRATIVE THERAPEUTICS INC.



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Vitaline Formulas

June 3, 2004

Office of Nutritional Products, Labeling &
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Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

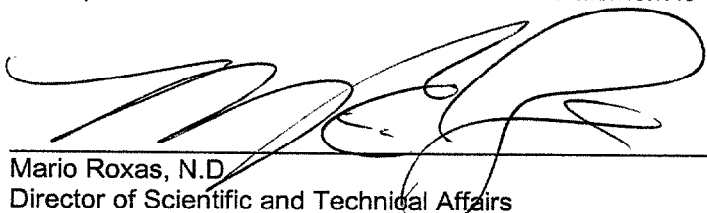
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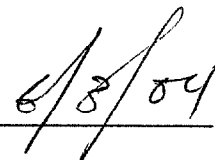
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Product Name	Statement	Ingredient(s) to which claim refers	
Mega MultiVitamin Drink Mix	Mega MultiVitamin Drink Mix can be easily mixed with beverages or yogurt, providing an alternative means of delivering nutrients and flexible serving options. †	Vitamin A (50% as beta carotene and as retinyl acetate) Vitamin C (as ascorbic acid) Vitamin D (as cholecalciferol) Vitamin E (as d-alpha tocopheryl acetate) Thiamin (as thiamine HCl) (Vitamin B1) Riboflavin (vitamin B2) Niacin (as niacinamide) Vitamin B6 (as pyridoxine HCl) Folic Acid Vitamin B12 (as cyanocobalamin) Biotin Pantothenic Acid (as calcium D-pantothenate) Calcium (as calcium lactate) Iodine (as potassium iodide) Magnesium (as magnesium glycinate) Zinc (as zinc sulfate) Selenium (as L-selenomethionine) Copper (as copper gluconate) Manganese (as manganese citrate) Chromium (as chromium picolinate) Molybdenum (as sodium molybdate) Sodium Potassium (from whey protein, guar gum, potassium citrate and potassium iodide)	Malic Acid Betaine Inositol Inulin (from chicory root) Hesperidin 50% (from citrus fruits) Taurine Glycine L-Tyrosine N-Acetylcysteine (NAC) L-Serine Stevia (Stevia rebaudiana) Leaf Extract Sour Cherry (Prunus cerasus) Fruit Extract Cranberry (Vaccinium macrocarpon) Fruit Extract Bilberry (Vaccinium myrtillus) Fruit Extract Boron (as sodium borate) Lutein (from Calendula officinalis) Zeaxanthin (from Calendula officinalis) Whey Protein Concentrate

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Mario Roxas, N.D.
Director of Scientific and Technical Affairs

Date



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NF Formulas



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Tyler Encapsulations



Vitaline Formulas

June 5, 2004

Office of Nutritional Products, Labeling &
Dietary Supplements, HFS 810
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

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Dear Sir:

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Product Name	Statement	Ingredient(s) to which claim refers
Mega MultiVitamin Drink Mix	Mega MultiVitamin Drink Mix contains high bioavailable levels (over 200%) of the water-soluble B vitamins; thiamin (B1), riboflavin (B2), niacinamide (B3), pantothenic acid, B6, B12 and folic acid that support metabolic pathways to provide high levels of energy.†	<p>Vitamin A (50% as beta carotene and as retinyl acetate) Vitamin C (as ascorbic acid) Vitamin D (as cholecalciferol) Vitamin E (as d-alpha tocopheryl acetate) Thiamin (as thiamine HCl) (Vitamin B1) Riboflavin (vitamin B2) Niacin (as niacinamide) Vitamin B6 (as pyridoxine HCl) Folic Acid Vitamin B12 (as cyanocobalamin) Biotin Pantothenic Acid (as calcium D-pantothenate) Calcium (as calcium lactate) Iodine (as potassium iodide) Magnesium (as magnesium glycinate) Zinc (as zinc sulfate) Selenium (as L-selenomethionine) Copper (as copper gluconate) Manganese (as manganese citrate) Chromium (as chromium picolinate) Molybdenum (as sodium molybdate) Sodium Potassium (from whey protein, guar gum, potassium citrate and potassium iodide)</p> <p>Malic Acid Betaine Inositol Inulin (from chicory root) Hesperidin 50% (from citrus fruits) Taurine Glycine L-Tyrosine N-Acetylcysteine (NAC) L-Serine Stevia (Stevia rebaudiana) Leaf Extract Sour Cherry (Prunus cerasus) Fruit Extract Cranberry (Vaccinium macrocarpon) Fruit Extract Bilberry (Vaccinium myrtillus) Fruit Extract Boron (as sodium borate) Lutein (from Calendula officinalis) Zeaxanthin (from Calendula officinalis) Whey Protein Concentrate</p>

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Mario Roxas, N.D.
Director of Scientific and Technical Affairs

Date

6/5/04

INTEGRATIVE THERAPEUTICS INC.



NF Formulas



PhytoPharmica



Tyler Encapsulations



Vitaline Formulas

June 3, 2004

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Product Name	Statement	Ingredient(s) to which claim refers	
Mega MultiVitamin Drink Mix	Included in this high potency mixture are all the essential amino acids, the building blocks required to create the proteins needed for proper function of the body. †	Vitamin A (50% as beta carotene and as retinyl acetate) Vitamin C (as ascorbic acid) Vitamin D (as cholecalciferol) Vitamin E (as d-alpha tocopheryl acetate) Thiamin (as thiamine HCl) (Vitamin B1) Riboflavin (vitamin B2) Niacin (as niacinamide) Vitamin B6 (as pyridoxine HCl) Folic Acid Vitamin B12 (as cyanocobalamin) Biotin Pantothenic Acid (as calcium D-pantothenate) Calcium (as calcium lactate) Iodine (as potassium iodide) Magnesium (as magnesium glycinate) Zinc (as zinc sulfate) Selenium (as L-selenomethionine) Copper (as copper gluconate) Manganese (as manganese citrate) Chromium (as chromium picolinate) Molybdenum (as sodium molybdate) Sodium Potassium (from whey protein, guar gum, potassium citrate and potassium iodide)	Malic Acid Betaine Inositol Inulin (from chicory root) Hesperidin 50% (from citrus fruits) Taurine Glycine L-Tyrosine N-Acetylcysteine (NAC) L-Serine Stevia (Stevia rebaudiana) Leaf Extract Sour Cherry (Prunus cerasus) Fruit Extract Cranberry (Vaccinium macrocarpon) Fruit Extract Bilberry (Vaccinium myrtillus) Fruit Extract Boron (as sodium borate) Lutein (from Calendula officinalis) Zeaxanthin (from Calendula officinalis) Whey Protein Concentrate

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Mario Roxas, M.D.

Director of Scientific and Technical Affairs

Date

6/3/04

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Vitaline Formulas

June 2, 2004

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College Park, MD 20740

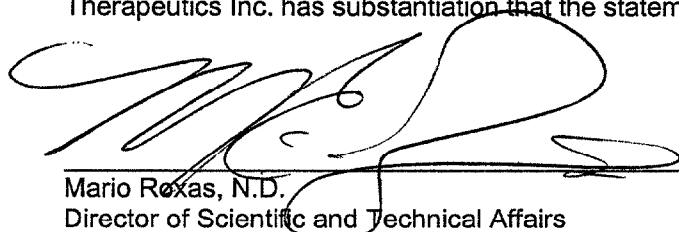
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Product Name	Statement	Ingredient(s) to which claim refers	
Mega MultiVitamin Drink Mix	Contains inulin as a fiber source and to support mineral absorption. †	Vitamin A (50% as beta carotene and as retinyl acetate) Vitamin C (as ascorbic acid) Vitamin D (as cholecalciferol) Vitamin E (as d-alpha tocopheryl acetate) Thiamin (as thiamine HCl) (Vitamin B1) Riboflavin (vitamin B2) Niacin (as niacinamide) Vitamin B6 (as pyridoxine HCl) Folic Acid Vitamin B12 (as cyanocobalamin) Biotin Pantothenic Acid (as calcium D-pantothenate) Calcium (as calcium lactate) Iodine (as potassium iodide) Magnesium (as magnesium glycinate) Zinc (as zinc sulfate) Selenium (as L-selenomethionine) Copper (as copper gluconate) Manganese (as manganese citrate) Chromium (as chromium picolinate) Molybdenum (as sodium molybdate) Sodium Potassium (from whey protein, guar gum, potassium citrate and potassium iodide)	Malic Acid Betaine Inositol Inulin (from chicory root) Hesperidin 50% (from citrus fruits) Taurine Glycine L-Tyrosine N-Acetylcysteine (NAC) L-Serine Stevia (Stevi rebaudiana) Leaf Extract Sour Cherry (Prunus cerasus) Fruit Extract Cranberry (Vaccinium macrocarpon) Fruit Extract Bilberry (Vaccinium myrtillus) Fruit Extract Boron (as sodium borate) Lutein (from Calendula officinalis) Zeaxanthin (from Calendula officinalis) Whey Protein Concentrate

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